

Sugar Cane Growers Cooperative of Florida

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June 4, 2008

Mr. Larry J. Prather, Assistant Director of Civil Works
HQUSACE
Attn: P&G Revision
CECE-ZA
441 G Street, NW
Washington, DE 20314-1000

Dear Mr. Prather:

I am writing on behalf of the 48 grower-members of Sugar Cane Cooperative of Florida, an agricultural cooperative based in Belle Glade, Florida located in the heart of the Everglades Agricultural Area (EAA). Primary functions of the Cooperative are the harvesting, transporting and processing of sugarcane and the marketing of the final products. Our grower-members ability to farm is dependent on the services provided by the Central and Southern Florida Flood Control Project and, therefore, we have a continuing interest in the Comprehensive Everglades Restoration Plan (CERP) that was intended to provide the framework for planning future improvements in the Project

We look to the U.S. Army Corps of Engineers for continuing its leadership role in the implementation of the CERP. Support of the plan was based on assurances that planning and evaluation of project components would be guided by the **Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies (P&G)**. Thus, any changes to the Principles and Standards sections (P&S) of the P&G are of great interest to us and we appreciate the opportunity to offer suggestions regarding their revision.

The existing P&S provide a powerful planning discipline that ensures systemic formulation and evaluation of alternatives and the identification of the tradeoffs among alternative plans. When properly followed by project planners, decision makers and the public are able to have confidence that all important benefits and costs have been identified, and that each element of a recommended project has benefits greater than its costs and represents the best use of the affected resources. Any changes in the P&S must preserve these fundamental attributes and the associated analytical requirements.

With regard to changes, we support the widely acknowledged need to explicitly affirm ecosystem restoration as a planning objective to be considered along with economic development

especially in regions like south Florida where there are degraded environments and unstable ecological systems that require improvements in order to be sustainable. This action would give permanence and institutional affirmation to what is actual Corps policy as well as practice.

We note that on-going CERP studies have not monetized even traditional economic water supply benefits, as directed by the current P&S. The requirement to monetize economic benefits needs to be strengthened in the revised P&S. Furthermore, we encourage the monetization of benefits whenever possible to promote consistent plan formulation and tradeoff evaluations. The revised P&S should encourage monetization of restoration and other non-traditional benefits to the extent that such evaluations are scientifically based and peer reviewed.

Finally, we note that ecological benefits occurring in the future are not subject to the same discounting process conducted for economic benefits. We are not indifferent as to when restoration is achieved, or the importance of the timing of restoration components, therefore the timing of benefits should be formally considered in the plan formulation and evaluation process.

Whatever changes are made in the planning guidance, it is essential that the recommended projects meet Federal authorizing and budgeting criteria so they can in fact be implemented. The revised P&S should make this clear and require that Project Feasibility Reports, including the Project Implementation Reports for CERP projects, clearly present the information necessary to expedite the authorization and appropriation of projects.

Any changes to the P&S should avoid the kind of meaningless language contained in the CERP's Programmatic Regulations that convey no objective meaning in the context of multiple planning objectives that use non-comparable measures of value such as dollars and "habitat units". Most notably, any language suggesting that planners are to "... formulate and evaluate alternative plans and their associated monetary and non-monetary benefits and costs, determine cost effectiveness and optimize the project's contribution towards achieving the goals and purposes of the Plan...." should be avoided.

We appreciate the opportunity to comment and we hope you find our suggestions in developing further improvements to the P&G that currently are the best planning model available.

Sincerely,



Barbara J. Miedema
Vice President, Public Affairs & Communications

BJM:swd